

TORY M. PANKOPF, ESQ. (NV BAR NO. 7477)  
LAW OFFICES OF TORY M. PANKOPF, LTD.  
748 S Meadows Parkway, Suite 244  
Reno, Nevada 89521  
Phone: 775.384.6956  
Fax: 775.384.6958  
Email: [tory@pankopfuslaw.com](mailto:tory@pankopfuslaw.com)

SCOTT D. JOHANNESSEN, ESQ. (CA BAR NO. 128841)  
Admitted *Pro Hac Vice*  
LAW OFFICES OF SCOTT D. JOHANNESSEN  
424 Church Street, Suite 2000  
Nashville, Tennessee 37219  
Phone: 833.419.6600  
Fax: 833.419.6601  
Email: [scott@sdjnet.com](mailto:scott@sdjnet.com)

*Attorneys for* ROBERT A. SLOVAK

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ROBERT A. SLOVAK,

Plaintiff,

v.

GOLF COURSE VILLAS HOMEOWNERS  
ASSOCIATION; WELLS FARGO BANK, N.A.,  
et al.,

Defendants.

Case No. 3:13-CV-0569-MMD-CLB

**REQUEST FOR EXTENSION OF TIME**

Plaintiff Robert A. Slovak ("Slovak"), through his undersigned counsel of record, respectfully requests an extension of time within which to respond to the Court's February 4, 2021 Minute Order (Doc. No. 302), as follows:

On October 27, 2020 Mr. Slovak deposited \$280,000 ("Deposited Funds") with One Nevada Credit Union in Reno, Nevada to demonstrate being ready, willing, and able to perform his obligations under his June 3, 2014 settlement with Defendant Wells Fargo Bank, N.A. ("Wells Fargo"). (Doc. No. 293-1.) On January 8, 2021 the Court (1) found that the Deposited Funds "shall remain in the account where they are currently being held and not be moved pending an evidentiary hearing in this case" and

(2) directed counsel “to meet and confer and prepare a written order or stipulation to secure the [Deposited Funds] for the Court’s approval.” (Doc. No. 301.) Mr. Slovak readily agreed to both Court directives.

During the January 8, 2021 hearing counsel for Wells Fargo agreed to prepare a draft stipulation and/or order for circulation, review and approval by Mr. Slovak’s counsel, and Mr. Slovak agreed to promptly respond to Wells Fargo’s proposal. To that end, Mr. Slovak’s counsel was expecting to receive the draft proposal no later than the end of January 2021, but he did not. (See **Exhibit 1** attached hereto.)

Wells Fargo’s draft proposal was received by Mr. Slovak’s counsel on February 11, 2021, after the Court set a compliance deadline of February 12, 2021. (Doc. No. 303.) Unfortunately, sufficient time has not been provided for Mr. Slovak and his counsel to review and comment on Wells Fargo’s proposal, which was provided one month after the January 8, 2021 hearing and one day before the Court’s February 12, 2021 compliance deadline.

Mr. Slovak respectfully asks the Court for an additional seven (7) days within which to review and, if necessary, modify Wells Fargo’s draft proposal in order to comply with his side of the Court’s January 8, 2021 meet and confer directive. Only one day to engage in a meaningful attorney conference presents scheduling difficulties for Mr. Slovak’s counsel and has proven insufficient. Mr. Slovak kindly submits that the requested 7-day review and comment period extension to **February 19, 2021** would support Mr. Slovak’s meet and confer efforts and allow his counsel to respond to Wells Fargo’s proposal. Under the circumstances, Mr. Slovak believes his request for additional time is reasonable and justified. And one additional week, Mr. Slovak respectfully submits, would prejudice no one.

Respectfully submitted,

IT IS SO ORDERED.

Dated: February 12, 2021

  
UNITED STATES MAGISTRATE JUDGE

/s/ Tory M. Pankopf  
TORY M. PANKOPF (NV BAR NO. 7477)  
LAW OFFICES OF TORY M. PANKOPF, LTD.

/s/ Scott D. Johannessen  
SCOTT D. JOHANNESSEN (CA BAR NO. 128841)  
Admitted *pro hac vice*  
LAW OFFICES OF SCOTT D. JOHANNESSEN

*Attorneys for* ROBERT A. SLOVAK

**CERTIFICATE OF SERVICE**

I hereby certify that on the below date I electronically filed the foregoing ***Request for Extension of Time*** with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

Dated: February 12, 2021.

/s/ Scott D. Johannessen

Scott D. Johannessen

**From:** Scott Johannessen <sdj@me.com>  
**Subject:** Re: Slovak/Wells Fargo  
**Date:** January 26, 2021 at 9:50 AM  
**To:** Dove, Kelly <kdove@swlaw.com>  
**Cc:** Tory Pankopf <tory@pankopfuslaw.com>

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Hi Kelly,

No worries. I was just checking in. Sounds good.

Thank you,

Scott

**Scott Johannessen, J.D.**  
Attorney • CPA

424 Church Street, Suite 2000  
Nashville, Tennessee 37219  
Phone: 833.419.6600 | 916.419.6600  
Fax: 833.419.6601 | 916.419.6601  
Email: [Nashville](mailto:Nashville@sdjnet.com) | [Sacramento](mailto:Sacramento@sdjnet.com)  
Web: [www.sdjnet.com](http://www.sdjnet.com)

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On Jan 25, 2021, at 6:13 PM, Dove, Kelly <kdove@swlaw.com> wrote:

Hello Scott-

My colleague, Jennifer, has been in trial for the past two weeks, which has set us a bit behind. However, we plan to circulate an order in the next day or two.

Thank you,  
Kelly

Kelly H. Dove | Snell & Wilmer LLP | P: (702) 784-5286 | F: (702) 784-5252

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**From:** Scott Johannessen <sdj@me.com>  
**Sent:** Friday, January 22, 2021 4:54 AM  
**To:** Dove, Kelly <kdove@swlaw.com>  
**Cc:** Tory Pankopf <tory@pankopfuslaw.com>  
**Subject:** Slovak/Wells Fargo

[EXTERNAL] [sdj@me.com](mailto:sdj@me.com)

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Hi Kelly,

Hope all's well with you and yours.

Have you had a chance yet to put together a draft document for what we discussed and Judge Baldwin ordered during our last court hearing? No hurry. I'm just checking in to

see if you might have something we can review and go over. Please let us know.

Have a nice weekend.

Thank you,

Scott

**Scott Johannessen, J.D.**  
Attorney • CPA

424 Church Street, Suite 2000  
Nashville, Tennessee 37219  
Phone: [833.419.6600](tel:833.419.6600) | [916.419.6600](tel:916.419.6600)  
Fax: [833.419.6601](tel:833.419.6601) | [916.419.6601](tel:916.419.6601)  
Email: [Nashville](mailto:Nashville@sdjnet.com) | [Sacramento](mailto:Sacramento@sdjnet.com)  
Web: [www.sdjnet.com](http://www.sdjnet.com)

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